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October 10, 2023

VIA ECF

The Honorable Judge Margo K. Brodie
United States District Court
for the Eastern District of New York
225 Cadman Plaza East
Courtroom 6F
Brooklyn, NY 11201

Magistrate Judge Vera M. Scanlon
United States District Court
for the Eastern District of New York
225 Cadman Plaza East
Room 1214 South
Brooklyn, NY 11201

Re: *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation*,
No. 1:05-MD-1720 (MKB)(VMS)

Dear Judges Brodie and Scanlon:

Pursuant to the Superseding and Amended Definitive Class Settlement Agreement of the Rule 23(b)(3) Class Plaintiffs and the Defendants (ECF 7257-2) (“Settlement Agreement”), Rule 23(b)(3) Class Counsel (“Class Counsel”) respectfully request the Court’s approval of (W)right On Communications, Inc.’s (“Wright On”) funding request to pay for services to date related to the claims administration process as discussed at the September 7, 2023 status conference. Settlement Agreement, ¶25. Should the Court not require monthly funding requests, Class Counsel will review invoices and arrange monthly payments through Huntington Bank and provide the Court updates quarterly.

Attached as Exhibit A is Wright On’s Invoice #1220-4345R for \$40,599.80. The expenses are related to services including design, social media research and review, development of presentations for educational outreach, database development, and other tasks as detailed in Exhibit A.

The total funding request is \$40,599.80.

Respectfully submitted,

/s/ *K. Craig Wildfang*
K. Craig Wildfang
Thomas J. Undlin
Robins Kaplan LLP

/s/ *H. Laddie Montague, Jr.*
H. Laddie Montague, Jr.
Merrill G. Davidoff
Berger Montague PC

/s/ *Alexandra S. Bernay*
Patrick J. Coughlin
Alexandra S. Bernay
Robbins Geller Rudman & Dowd LLP

Exhibit A

cc: All Counsel via ECF